

UNITED STATES DISTRICT COURT

District of Massachusetts

1 courthouse way, suite 2300

Boston, Massachusetts. 02210

617-748-9152

Rashid Jahm

Pro se

Plaintiff

Case No:05CV11638-JLT

Jury Trial Demanded

Vs

Peabody & Arnold LLP

Patrick Dolan, BBO 564250 Attorney for Defendants

Catherine Garcia- Lindstrom in his official and individual capacity

Walker Police Department and Brian Cardecia vice president, James Youngblood  
of Midwest Claim services Inc

30 Rowes Wharf

Boston, Ma 02110

(617) 951-4724

Defendant-Appellees

**ANSWER TO MOTION OF DEFENDANTS CATHERINE GARCIA  
LINDSTROM AND MIDWEST CLAIM**

Now come the plaintiff Rashid Jahm pro se move this Honorable Court for

demand of jury trial for clearly on the ground of defendant has failed to

answers to plaintiff's complaint truthfully Instead bring irrelevant issues

which is not relevant to case in the federal Court. Plaintiff do request to

Honorable Court for compelling defendant to answer truthfully. This Court

has Jurisdiction on conspiracy and violation of constitutional right.

Jurisdiction of this action is based upon federal question jurisdiction pursuant to

Title 28, United States Code, Sections 1331, 1331(a) and the Due Process Clause

of Art. IV of the United States Constitution. This court has jurisdiction over plaintiff's common law claims, infra, and venue is proper pursuant to Title 28, United States Code, Section 1391. The issue before this court is the violation of the Plaintiff's civil rights pursuant to Title 42 U. S. C. § 1983 and 1985(2) and raises federal questions and constitutional issues.

1. Defendant Catherine Garcia- Lindstorm heard when plaintiff object to altered and tampered pictures showed by Craig Noland to plaintiff on his witness stand and judge Dennis Leiber warn to plaintiff don't not object, in his own word I warn you. Plaintiff said to Judge Dennis Leiber your Hon. I cannot tell that these pictures presented by Craig Noland are alter and tampered? Defendant Catherine Garcia- Lindstorm was sitting wearing chief police uniform same table with Craig Noland when Craig Noland showed tampered and altered Pictures to plaintiff on his witness stand, which were downloaded from CD. These pictures were originally taken by police officer by camera at the scene.
2. Defendant Catherine Garcia- Lindstorm was present in her Uniform as police chief during entire trial period. Why don't she give affidavits for that she did not heard or she did heard Boat ride offered from Craig Noland to Midwest claim services employee.
3. Defendant Catherine Garcia- Lindstorm why not give Affidavit that she did heard when plaintiff object to tampered and altered pictures which was presented by Craig Noland and judge D.Lieber warn to plaintiff not to mention.

4. Defendant Catherine Garcia- Lindstorm why not give affidavit if she give pictures of the scene taken by police to Craig Noland in form of photo or in other form.
5. Defendant James Youngblood why not give affidavit of truth that he knows about the case and plaintiff did send him Letter. **See Exhibit A**
6. Defendant James Youngblood Why not gives affidavit of \$75000 or more. And how much more?
7. Defendant Catherine Garcia- Lindstorm heard Craig Noland offered weekend boat ride to Midwest's Brian Cardecia claims adjuster in front of the elevator when plaintiff, his attorney and Defendant Catherine Garcia- Lindstorm was waiting for the elevator.
8. Defendant always came during entire trial in police chief uniform
9. Defendant called to stop Craig Noland when Craig Noland was taking testimony of plaintiff's two expert witnesses. That was clearly harassment tactics to plaintiff's witnesses.

WHEREFORE, plaintiff request that this Honorable Court for jury trial and discovery.

Dated: February 1, 2006

Rashid Jahm  
Pro se

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Document mailed by us postal to all  
Patrick Dolan  
John A. Christopher

Stephen J. Duggan  
Juliana deHaan rice  
Mark E. Donnelly (P39281) Pro Hac Vice  
George L. McCarger

CERTIFICATE OF SERVICE

Dear Clerk

I hereby certify that a true copy of the foregoing document was served on all know parties herein by causing a copy of the same to be mailed, postage prepaid on February 1, 06.



Rashid Jahan

**EXHIBIT**